

# **A COMPREHENSIVE MANAGEMENT PLAN**

Please write your plan in lay terms, using language understandable by non-expert readers.

## **I. Fully Describe the External Relationship(s)**

1. Identify each individual involved. Include full name, department or center, and home college.
2. Describe the sponsored research project that relates to this potential for conflict. Include a brief description of the research itself, products or other likely outcomes (real or anticipated), and the funding agency.

If appropriate, provide a list of other sponsored research projects for which you serve as principal investigator.

3. What is the name of external business/organization?

Describe the primary mission and/or nature of the organization.

What is your specific role in this business/organization, (e.g., ownership, employment, service, investment, etc.)?

4. Describe the interaction between your University role and your role with the external entity which produces the potential for conflict. In particular, provide specific clarification of the separation between the nature of the consulting and/or business activities and the scope of the research grant.

## II. Identify the Area(s) of Potential Conflict of Interest

Use the following checklist to identify the area of potential conflict of Interest.

To flesh out the full scope of the potential for conflict of interest, refer to the *Board of Regents Policy on Conflict of Interest*, specifically the section outlining activities and external relationships that have moderate to high potential for conflict (Article 5, Section III, Subd. 1-4, and Article 6). A management plan is required for situations falling within the parameters of a “Moderate to High Potential for Conflict.”

### RESEARCH ACTIVITIES

YES	NO	QUESTIONS
		Are you conducting or participating in a clinical trial or the development of a technology, process, or product owned or controlled by a business in which you, an immediate family member, or an associated entity has a financial or business interest?
		Do you assign students, postdoctoral fellows, or other trainees or employees to projects supported by a business (through sponsored research or a contribution) in which you, an immediate family member, or an associated entity has a financial or business interest (other than royalty income)?
		Do you receive University-supervised sponsored research support or contributions (whether in dollars or in kind) from a business in which you, an immediate family member, or an associated entity has a financial or business interest?

### FINANCIAL OR BUSINESS INTERESTS

YES	NO	QUESTIONS
		Do you and/or an immediate family member have an aggregated equity interest in a business representing ownership of 5 percent or more, or a value of \$10,000 or more?
		Do you and/or an immediate family member expect to receive an aggregated annual income of at least \$10,000 from an external business?
		Do you receive research support (sponsored research or a contribution) from a business in which you or an immediate family member serve on the board of directors or advisory board?
		Do you or an immediate family member hold an executive position in a business engaged in commercial or research activities directly related to your University responsibilities?
		Have you received contributions of greater than \$1,000 per year from a business in which you have a financial interest?

### **ADMINISTRATIVE RESPONSIBILITIES**

<b>YES</b>	<b>NO</b>	<b>QUESTIONS</b>
		Do you take administrative action on behalf of the University with respect to the University or any University-affiliated organization that is beneficial to a business in which you, an immediate family member, or an associated entity has a financial or business interest?
		Do you take administrative action on behalf of the University with respect to any supported research activity (sponsored research or a contribution) in which you, an immediate family member, or an associated entity has a financial or business interest in the sponsor or donor?

### **PROFESSIONAL REFERRALS**

<b>YES</b>	<b>NO</b>	<b>QUESTIONS</b>
		Do you make professional referrals to a business in which you, an immediate family member, or an associated entity have a financial or business interest of which you are aware or reasonably should be aware?

### **PURCHASING GOODS AND SERVICES**

<b>YES</b>	<b>NO</b>	<b>QUESTIONS</b>
		Do you have direct or indirect influence over purchasing decisions or contracts?
		Do you have any official involvement in the purchasing or contracting process?

### **III. Management Strategies to Guard Against the Escalation of a True Conflict of Interest**

The Regents Policy on Conflict of Interest provides general guidelines to remove the potential for conflict (see *Mechanisms for Remediation*, Article 8, Section II). While the complexity of potential conflict differs from case to case and you are encouraged to address the specifics of your own situation, a standard management plan is frequently comprised of many of the following strategies:

**1. Full, appropriate disclosure of relationships to interested parties is a part of every conflict management plan. Be sure to include:**

- Students and advisees
- Others working with you on the professional activity in question
- Journal Editors
- Program Committees and Review Panels
- All sponsors, including sponsors of related research and particularly federal sponsors to comply with federal policy

**How do you plan to make full, appropriate disclosure with regard to your financial or business interests with an external entity, to all interested parties?**

Include copies of your disclosure letters which explicitly disclose the nature of the relationships regarding any financial and/or business interests, pertinent licensing agreement(s), the relationship between intellectual property and the licensing agreement, etc.

- 2. Certification of Compliance with the Regents Policy on Outside Consulting:** Include a statement acknowledging either:
- a) Verification that no University funds, facilities, or personnel will be involved in this consulting work with the external entity
  - b) Procurement of prior approval from the dean, with reimbursement for direct and indirect costs.
- 3. Mechanism(s) to Ensure Academic Integrity:** Our primary priority is to ensure the integrity of the academic research endeavor. To this end, it may be useful to consider the following measures:
- Periodic peer review or oversight review of the activity
  - Suggest names of other faculty members who may agree to monitor your external relationships as they relate to your research contract
  - The peer reviewer may submit a report to the Dean, or a designee of the Dean, either orally or in writing.
- 4. How do you plan to ensure integrity?**
- 5.** In some cases, the nature of the research activity may eliminate the potential for conflict of interest. If so, explain why, fully but succinctly.

6. In other cases, particularly for projects with strongly applied or proprietary interest, or with high potential economic impact for a company or industrial sector, the objectivity of research may be questioned in one or more of the following areas:

- Problem definition and research design
- Data integrity and confidentiality
- Data analysis
- Reporting results.

In such cases, your management plan should suggest steps you think should be taken in these areas to ensure confidence in the objectivity of your results. These may include standard procedures in your discipline, which you should briefly summarize. They may also include additional steps, such as:

- Review of the problem formulation and research design by a disinterested party who is aware of your business or financial interest that creates a potential conflict
- Use of a third-party organization, such as the Center for Survey Research, to receive and code survey data
- Concurrent replication at another site where researchers do not have a business or financial interest
- Assignment of another faculty member as principal investigator of the project.